REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 2, 3, 13, 41, and 42 have been amended. No claims have been cancelled or added.

Applicants wish to thank the Examiner for his willingness to conduct an interview. Applicants attempted to contact the Examiner twice during the this period, and were unable to do so. Applicants apologize, and request that the Examiner contact the undersigned at 408-720-8300 x269, or 408-368-6048 at any time to discuss any claim amendments that would be useful in putting the present invention into proper format for allowance.

Examiner rejected claims 1-6, 9-13, 16-48, and 51-52 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,915,112 to Boutcher.

Claim 1 recites in part "identifying at least one particular host device that is connected to the first device, including determining communication information allowing communication between the first device and the particular host device, and determining command information allowing the first device to invoke execution of the application or driver of interest at the particular host device." The Examiner suggests that column 3, lines 35052 of Boutcher teach this element. Applicants respectfully disagree. The systems of Boutcher use an RPC protocol. And as Boutcher notes:

> In general, to develop an RPC application, the desired interface between a client and a server is defined using an interface definition language (IDL) which specifies the desired remote procedures and the data structures, constants, and parameters required for implementation of the procedures. For example, FIG. 3 illustrates a typical RPC interface, which generally has the form:

interface <interface name> version (<major> [:<minor>]) {declarations}
Next the interface file is compiled using an IDL compiler. Typically,
compilation of the interface file results in four files. On the client system,
client stub and client header files are generated. ... Similarly two files are
generated on the server system, including the server stub file and a server
header file. (Column 6, line 55 to column 7, line 7).

(Column 6, line 55 to column 7, line 7).

Therefore, inherent in the RPC protocol described by Boutcher is the creation of

these client and server stubs prior to the ability to utilize the RPC, and prior to the

connection of the server to the client for execution of processes. In contrast, claim 1 of

the present invention recites "determining command information allowing the first device

to invoke execution of the application or driver of interest at the particular host device"

when the "particular host device is connected to the first device." In Boutcher's system,

such an identification is unnecessary, since the preexisting client and server stubs

provide this information. Therefore, no such identification takes place when the first

device is coupled to a host device.

Therefore, claim 1, and claims 2-13 and 16-40 which depend on it are not

obvious over or anticipated by Boutcher.

Claim 41, as amended, recites in part "transmitting at least one command from

the first device that invokes execution of the driver of interest at the second device,

whereupon the driver executes at the second device, the driver for controlling the

interaction between the first device and the second device, and further for controlling

the operation of the first device." The purpose of using RPC, as noted by Boutcher is to

reduce the amount of code necessary, by using the client and server stubs. There is no

need for the client to send anything beyond the actual application program, because the

server stub understands how to handle the application data sent. In contrast, claim 41

notes that the uploaded application is a <u>driver for controlling the interaction between the</u> <u>first device and the second device</u>. The interaction between the devices of Boutcher are controlled by the pre-existing server/client stubs.

Therefore, claim 41, and claims 42-50 which depend on it, are not obvious over or anticipated by the references.

Claim 51 recites in part " a physical manager identify a host coupled to the client device." Applicants respectfully submit that Boutcher does not teach or suggest such a physical manager. The communication between a server and a client using RPC is scripted. The client knows the host, and does not need to identify it. Therefore, claim 51, and claim 52 which depends on it, are not obvious over or anticipated by the references.

Examiner rejected claims 7-8 and 49-50 under 35 U.S.C. §103(a) as being unpatentable over Boutcher in view of U.S. Patent No. 5,928,325 to Shaughnessy et al.

Claims 7-8 depend on claim 1, and claims 49-50 depend on claim 41. Shaughnessy does not remedy the shortcomings of Boutcher discussed above with respect to the parent claims. Therefore, claims 7-8 and 49-50 are not obvious over the combination of references.
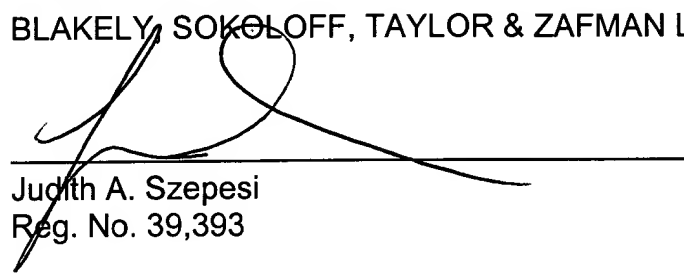
Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

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